

**DECLARATION OF THERESA MARIE BROOKE**

Theresa Marie Brooke declares under penalty of perjury as follows:

1. I am competent to testify as to all of the facts set forth herein and will so testify if called upon to do so. I have personal knowledge of the matters set forth herein, based upon my observations and personal participation in the events described below.

2. I am the Plaintiff in the above-captioned case. I am seeking \$4,000.00 in Unruh damages in this case.

3. In the past twelve months preceding the filing of this case, my attorney Peter Kristofer Strojnik has filed 10 or more construction-related accessibility violation complaints on my behalf and at my direction, with me as the named plaintiff.

4. I have never filed a construction accessibility complaint to my recollection. My attorney files these cases on my behalf.

5. Section (b)(1) of CCP 425.55 defines a high frequency litigant as a *“plaintiff who has filed 10 or more complaints* alleging a construction-accessibility violation within the 12-month period immediately preceding the filing of the current complaint alleging a construction-related accessibility violation.”

6. I declare the foregoing is true and correct under the penalty of perjury to the best of my knowledge, recollection and information.

Further the declarant sayeth naught.

DATED this 5<sup>th</sup> day of June, 2025.



---

Theresa Marie Brooke